

# **EXHIBIT E**

**Exhibit B – Defendants’ Proposed Case Management Schedule**

*In re: Social Media Adolescent Addiction/Personal Injury Products Liability Litigation | Case No. 4:22-md-03047-YGR*

EVENT	DEADLINE
<b>KEY TRIAL DATES</b>	<ul style="list-style-type: none"> <li>● Joint Pretrial Conference Statement: <b>August 21, 2025</b></li> <li>● Final Pretrial Conference: <b>September 5, 2025, 9:00 a.m. PDT</b></li> <li>● <b>Trial Date: September 22, 2025, 8:00 a.m. PDT</b></li> </ul>
Privilege Log Protocol	<ul style="list-style-type: none"> <li>● <b>February 12, 2024</b></li> </ul>
Submit Agreed Upon or Competing Proposals for Plaintiff Fact Sheet for School District/Government Entity (“SD/GE”) Cases	<ul style="list-style-type: none"> <li>● <b>February 16, 2024</b></li> </ul>
Submit Agreed Upon or Competing Proposals for Personal Injury (“PI”) and SD/GE Bellwether Order, Including Selection Methodology	<ul style="list-style-type: none"> <li>● <b>February 16, 2024</b></li> </ul>
PI Plaintiffs to Provide Records Authorizations for any physicians who diagnosed or treated Plaintiffs for any injury alleged	<ul style="list-style-type: none"> <li>● <b>March 6, 2024</b></li> </ul>
Deposition Protocol	<ul style="list-style-type: none"> <li>● <b>February 20, 2024</b></li> </ul>
Mandatory Exchange of Initial Disclosures for All Parties (AG, PI, and SD/GE Cases)	<ul style="list-style-type: none"> <li>● <b>February 22, 2024</b></li> </ul>
Entry of SD/GE PFS Implementation Order and PI and SD/GE Bellwether Order	<ul style="list-style-type: none"> <li>● <b>February 23, 2024</b></li> </ul>
Plaintiff Fact Sheets for SD/GE Cases	<ul style="list-style-type: none"> <li>● <b>March 15, 2024 (or 21 Days from Entry of SD/GE PFS Implementation Order, whichever is later)</b></li> </ul>
Plaintiff Fact Sheets for PI Cases	<ul style="list-style-type: none"> <li>● <b>May 13, 2024 (105 Days from Entry of CMO 8, which granted proposed PI PFS Implementation Order)</b></li> </ul>

EVENT	DEADLINE
SD/GE Bellwether Discovery Pool Created – Parties’ Proposed Selections & Court’s Random Selection of Bellwether Discovery Pool Picks	● <b>March 29, 2024 (or 14 Days from PFS Deadline for currently-filed cases, whichever is later)</b>
PI Bellwether Discovery Pool Created – Parties Proposed Selections & Court’s Random Selection of Bellwether Discovery Pool Picks	● <b>May 24, 2024 (or 14 Days from receipt of MDL Centrality aggregated PI PFS data for currently-filed cases, whichever is later)</b>
Fact Discovery Deadline (AGs, Defendants, “Core” PI and SD/GE Plaintiff Discovery Pool) <sup>1</sup>	● <b>January 23, 2025</b>
Plaintiffs’ Expert Reports (non-case specific)	● <b>January 31, 2025</b>
Parties Strike from Bellwether Discovery Pools to Narrow to PI and SD/GE Bellwether Trial Pools	● <b>February 6, 2025</b>
Defendants’ Expert Reports (non-case specific)	● <b>February 21, 2025</b>
Rebuttal Reports (non-case specific)	● <b>March 7, 2025</b>
Depositions of Non-Case Specific Experts	● <b>March 28, 2025</b>
Fact Discovery Deadline for Bellwether Trial Pools (non-“Core” PI and SD/GE Plaintiff Discovery Pool)	● <b>April 10, 2025</b>
Plaintiffs’ Expert Reports (case specific)	● <b>April 4, 2025</b>
Defendant’s Expert Reports (case specific)	● <b>April 25, 2025</b>
Rebuttal Reports (case specific)	● <b>May 9, 2025</b>
Depositions of Case Specific Experts	● <b>May 30, 2025</b>
Expert Discovery Deadline	● <b>May 30, 2025</b>
<b>Parties Submit Simultaneous Briefing on Bellwether Trial Picks</b>	● <b>June 2, 2025</b>

<sup>1</sup> Additional fact and expert party and third-party discovery may be taken of both PI and SD/GE Plaintiffs selected for the Bellwether Trial Pools.

EVENT	DEADLINE
Court to Determine Composition of PI and SD/GE Bellwether Trial Cases and Establish Order of Bellwether Trial Cases	• <b>June 6, 2025</b>
Dispositive and Rule 702 Motions <sup>2</sup>	<ul style="list-style-type: none"> <li>• Opening Motions: <b>June 27, 2025</b></li> <li>• Oppositions: <b>July 18, 2025</b></li> <li>• Replies: <b>August 1, 2025</b></li> <li>• Oral Argument: <b>TBD</b></li> </ul>
Witness Lists	<ul style="list-style-type: none"> <li>• Exchange (all parties): <b>August 21, 2025</b></li> <li>• Submit Witness List Chart to Court: <b>August 22, 2025</b></li> </ul>
Deposition Designations <sup>3</sup> [Written Transcript of All Exhibit Audio or Video Recordings to Opposing Counsel]	<ul style="list-style-type: none"> <li>• Affirmative Designations: <b>July 18, 2025</b></li> <li>• Objections/Counters to Affirmatives: <b>August 1, 2025</b></li> <li>• Objections to Counters/Counter-Counters: <b>August 8, 2025</b></li> <li>• Objections to Counter-Counters: <b>August 15, 2025</b></li> <li>• Submit to Court: <b>August 22, 2025</b></li> </ul>
Exhibits Lists and Exhibits (including charts, schedules, summaries, diagrams, recordings,	<ul style="list-style-type: none"> <li>• Exchange (each party): <b>August 8, 2025</b></li> </ul>

<sup>2</sup> The Parties propose waiving the Court's pre-MSJ letter-brief and conference requirement. Consistent with the Parties' discussion with the Court at the January 26, 2024 Case Management Conference, Defendants are not proposing early deadlines for general causation Rule 702 motions. Defendants request the opportunity to revisit this issue with the Court at the appropriate time. Defendants also request that the Parties separately meet and confer regarding a process and timeline for establishing briefing parameters for both Rule 702 motions and MSJs (i.e., number of briefs, page limits, etc.).

<sup>3</sup> Proposed deadlines are subject to reasonable limitations being set on the total number of hours of deposition designations, commensurate with the overall trial length. In order to facilitate the efficient exchange of deposition designations, counter-designations, and objections, and to make it easier for the Court to rule on the same, the Plaintiffs and Defendants shall unify all of their excerpts from designations, counters, and objections for an individual witness before sending to the other side so the other side receives a single unified set of designations, counters, and objections, etc., per witness. Plaintiffs and Defendants may identify which group is presenting such materials (e.g., Meta only, TikTok only, PI Plaintiffs only, etc.). The Parties shall exchange deposition designations, counter-designations, and objections in an agreed-upon format.

EVENT	DEADLINE
and other similar documentary materials <i>in the form to be used at trial</i> ), except for impeachment or rebuttal	<ul style="list-style-type: none"> <li>● Objections: <b>August 18, 2025</b></li> <li>● Submit to Court Combined List of Exhibits Objected to and Exhibits Admitted by Stipulation: <b>August 22, 2025</b></li> <li>● Submit to Court Final Exhibits: <b>September 19, 2025</b></li> </ul>
Proposed Jury Instructions, Preliminary Statement of the Case, Verdict Form, and Voir Dire	<ul style="list-style-type: none"> <li>● Plaintiffs Serve Draft Proposed Instructions: <b>August 4, 2025</b></li> <li>● Defendants Serve Proposed Revisions and Additions: <b>August 11, 2025</b></li> <li>● Meet and Confer: <b>August 18, 2025</b></li> <li>● Submit to Court: <b>August 22, 2025</b></li> </ul>
Proposed Jury Questionnaire	<ul style="list-style-type: none"> <li>● Plaintiffs' Proposed JQ: <b>August 4, 2025</b></li> <li>● Defendants' Proposed Revisions and Additions: <b>August 11, 2025</b></li> <li>● Meet and Confer: <b>August 18, 2025</b></li> <li>● Submit to Court Joint or Competing Proposals: <b>August 22, 2025</b></li> </ul>
Motions <i>in Limine</i>	<ul style="list-style-type: none"> <li>● Exchange MILs: <b>August 8, 2025</b></li> <li>● Meet and Confer Deadline: <b>August 12, 2025</b></li> <li>● File Unresolved MILs: <b>August 14, 2025</b></li> <li>● Oppositions to Exhibit-Related MILs: <b>August 21, 2025</b></li> </ul>
Stipulated Issues of Fact	<ul style="list-style-type: none"> <li>● Exchange Proposed Stipulations, if any: <b>August 7, 2025</b></li> <li>● Submit to Court: <b>August 21, 2025</b></li> </ul>
Trial Briefs on Disputed Issues of Law (including procedural and evidentiary issues)	<ul style="list-style-type: none"> <li>● Opening Briefs: <b>August 22, 2025</b></li> <li>● Oppositions: <b>August 29, 2025</b></li> </ul>
Mediation <sup>4</sup>	<ul style="list-style-type: none"> <li>● Deadline: <b>TBD</b></li> </ul>

<sup>4</sup> Within fourteen (14) days of the entry of the Pretrial Scheduling Order, Designated Lead Counsel shall—after conferring with opposing counsel and the mediator—file a Notice with the

EVENT	DEADLINE
	● Mediator: <b>TBD</b>
Joint Pretrial Conference Statement Meet and Confer	<b>August 15, 2025</b>
Joint Statement of Compliance regarding Pretrial Conference Statement Meet and Confer	<b>[5 business days prior to Compliance Deadline to be set by Court]</b>
Compliance Deadline for Joint Pretrial Conference Statement Meet and Confer	<b>[TBD by the Court]</b>
Joint Pretrial Conference Statement <sup>5</sup>	<b>August 21, 2025</b> (consider 5 pm PDT deadline, or mutually agreeable exchange time)
Joint Trial Readiness Binder <sup>6</sup>	<b>August 22, 2025, by Noon PDT</b>
Pretrial Conference	<b>September 5, 2025, 9:00 a.m. PDT</b>
Jury Selection	<b>September 17, 2025</b>
Trial Term Begins	<b>September 22, 2025, 8:00 a.m. PDT</b>

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Court advising of the date and location of the Parties' arbitration/mediation, which shall occur on or before the date referenced above.

<sup>5</sup> The joint final pretrial conference statement will contain: (i) substance of the action/relief prayed; (ii) factual basis of the action; (iii) disputed legal issues; (iv) further discovery or motions that remain, (v) estimate of trial time; (vi) list of Motions *in Limine*; (vii) Juror Questionnaire statement; and (viii) trial alternatives and options (i.e., settlement discussions, consent to trial before Magistrate, amendments/dismissals, bifurcation/separate trial of issues).

<sup>6</sup> Joint Trial Readiness Binder shall contain copies of the following: (i) Pretrial Conference Statement; (ii) Proposed Order re: Trial Stipulations; (iii) Witness List chart; (iv) Expert Witness List chart; (v) Exhibits Lists annotated with stipulations/objections; (vi) List of Discovery Excerpts, Audios, and Videos; and (vii) Joint Set of Jury Instructions, Preliminary Statement of the Case, Verdict Form, and Voir Dire.